UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

MAVERICK GAMING, LLC,

Plaintiff,

v.

UNITED STATES OF AMERICA, UNITED STATES DEPARTMENT OF THE INTERIOR, DEB HAALAND, BRYAN NEWLAND, JAY INSLEE, ROBERT FERGUSON, BUD SIZEMORE, JULIA PATTERSON, ALICIA LEVY, KRISTINE REEVES, SARAH LAWSON, STEVE CONWAY, JEFF HOLY, SHELLEY KLOBA, BRANDON VICK, and TINA GRIFFIN,

Civil Action NO. 1:22-cv-00068-FYP

Defendants.

STATE DEFENDANTS' MOTION TO TRANSFER VENUE

Defendants Jay Inslee, Robert Ferguson, Bud Sizemore, Julia Patterson, Alicia Levy, Kristine Reeves, Sarah Lawson, Steve Conway, Jeff Holy, Shelley Kloba, Brandon Vick, and Tina Griffin (collectively, the State Defendants), all in their official capacities, respectfully move for an order from this Court transferring this action from this District to the U.S. District Court for the Western District of Washington under 28 U.S.C. §§ 1631 and 1406(a), or in the alternative, under 28 U.S.C. § 1404(a). This motion is based on the following memorandum of points and authorities in support.

Defendants the United States of America, the United States Department of the Interior, Deb Haaland, and Bryan Newland (collectively, the Federal Defendants), join the request to transfer on convenience grounds for the reasons stated in Section IV.C of the following memorandum of points and authorities in support.

DATED this 24th day of February, 2022

ROBERT W. FERGUSON Attorney General of Washington

s/Kristin Beneski

KRISTIN BENESKI, WSBA No. 45478
First Assistant Attorney General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104-3188
(206) 464-7744
kristin.beneski@atg.wa.gov
brian.rowe@atg.wa.gov

CERTIFICATE OF SERVICE

I certify, under penalty of perjury under the law of the District of Columbia, that the foregoing was electronically filed in the United States District Court for the District of Columbia and electronically served on the following parties:

Theodore B. Olson, DCBA No.
Matthew D. McGill, DCBA 481430
Lochlan F. Shelfer, DCBA No. 1029799
Gibson, Dunn & Crutcher LLP
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036
(202) 955 – 8668
tolson@gibsondunn.com

DATED this 24th day of February 2022,

ROBERT W. FERGUSON Attorney General of Washington

s/ Kristin Beneski
KRISTIN BENESKI, WSBA No. 45478
First Assistant Attorney General